

Exhibit UU

MONIKA S. PUNDALIK
MP 006542003

XCZ-102962-R1/bga
ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Plaintiff
200 Sheffield Street, Suite 101
Mountainside, NJ 07092-0024
1-908-233-8500

21st Mortgage Corporation

Plaintiff,

vs.

Frank J. Reed III, his/her heirs, devisees, and personal
representatives, and his, her, their or any of their
successors in right, title and interest; Christina A.
Reed, his/her heirs, devisees, and personal
representatives, and his, her, their or any of their
successors in right, title and interest; TD Bank fka TD
Bank, NA; American Express Centurion Bank; New
Century Financial Services Inc; Unsatisfied Claim and
Judgment Fund; State of New Jersey; United States of
America;

Defendant(s)

: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION
: BURLINGTON COUNTY
: DOCKET NO.

F -008034-14

Civil Action

**COMPLAINT
FOR
FORECLOSURE**

21st Mortgage Corporation, (hereinafter "plaintiff"), located at 620 Market Street, 1 Ctr. Sq.,
Attn: Ryan Shelley, Knoxville, TN 37902 says:

FIRST COUNT

1. On May 31, 2006, Frank J. Reed III executed to Metrocities Mortgage, LLC a Note (hereinafter "Note") securing the sum of \$1,000,000.00, payable on June 1, 2036 with the initial interest rate of 6.375% per annum. The Plaintiff is the holder of the Note.

2. To secure the payment of the Note, Frank J. Reed III and Christina A. Reed, husband and wife, executed to Mortgage Electronic Registration Systems, Inc., as nominee for Metrocities Mortgage, LLC, a Mortgage (hereinafter "Mortgage") dated May 31, 2006, and thereby mortgaged to Mortgage Electronic Registration Systems, Inc., as nominee for Metrocities Mortgage, LLC in fee the land hereinafter described (hereinafter "Mortgaged Premises"). Said Mortgage was duly recorded on September 25, 2006, in the Office of the Clerk of Burlington County, in Mortgage Book 11124, Page 410. The Mortgage is a Purchase Money Mortgage.

3. The legal description of the Mortgaged Premises is described on the Schedule annexed hereto and made a part hereof.

SCHEDULE A- Legal Description

ALL the following described property located in the Township of Moorestown, County of Burlington, State of New Jersey:

COMMONLY known as 817 Matlack Drive, Moorestown, NJ 08057.

BEING also known as Lot 2, Block 3803 on the tax map of the Township of Moorestown.

The following is a metes and bounds legal description as found in the Mortgage:

ALL that certain lot, piece or parcel of land, with the buildings and improvements thereon erected, situate, lying and being in Township of Moorestown, in the County of Burlington, State of NJ:

BEGINNING at a point in the Southerly right of way line of Matlack Drive (60 feet wide), said point being 580.94 feet Westwardly from the Westerly end of a curve having a radius of 20.00 feet and connecting said line of Matlack Drive with the Westerly right of way line of New Albany Road (66 feet wide); thence

1. South 12 degrees 58 minutes 42 seconds West, 185.00 feet to a point; thence
2. North 77 degrees 01 minute 18 seconds West, 111.42 feet to a point; thence
3. North 14 degrees 38 minutes 30 seconds West, 156.41 feet to a point in said line of Matlack Drive; thence
4. North 75 degrees 21 minutes 30 seconds East, along said line of Matlack Drive, 33.75 feet to a point of curvature; thence
5. Eastwardly and curving to the right with a radius of 270.00 feet, still along said line of Matlack Drive, the arc distance of 130.16 feet to a point of tangency, thence
6. South 77 degrees 01 minute 18 seconds East, still along said line of Matlack Drive, 28.86 feet to the point and place of BEGINNING.

BEING Block 3803, Lot 2 as shown on the "Final Plan of Lots, Mechling Farms, Section 3", Filed May 15, 2003 as Map #3821600.

FOR INFORMATION PURPOSES ONLY: BEING known as Lot 2, Block 3803 on the Official Tax Map of Township of Moorestown.

Above description made in accordance with a survey made by Wallace Associates, dated March 10, 2006.

4. The following Assignments of Mortgage appear in the chain of assignment:

a. By assignment of mortgage dated May 22, 2008 from Mortgage Electronic Registration Systems, Inc., as nominee for Metrocities Mortgage, LLC to GMAC Mortgage, LLC. Said assignment was duly recorded on November 17, 2008 in the Office of the Clerk of Burlington County in Assignment Book AB1921 at Page 345.

b. By assignment of mortgage dated December 4, 2013 from GMAC Mortgage, LLC to Residential Funding Company LLC fka Residential Funding Corporation. Said assignment was recorded on December 10, 2013 in the Office of the Clerk of Burlington County in Assignment Book OR13107 at Page 1125.

c. By assignment of mortgage dated December 4, 2013 from Residential Funding Company LLC fka Residential Funding Corporation to 21St Mortgage Corporation, Plaintiff herein. Said assignment was recorded on December 10, 2013 in the Office of the Clerk of Burlington County in Assignment Book OR13107 at Page 1127.

5. Plaintiff is entitled to enforce the note and mortgage under applicable law.

6. The Note contains a provision that says that if the obligor commits an act of default the entire amount due on the Note may be demanded. After the default herein the entire amount due on the loan has been accelerated.

7. The obligor(s) has/have failed to make the installment payment when same became due and payable. Therefore the loan is in default as of February 1, 2008.

8. As a result of said default, plaintiff hereby elects and declares that the whole unpaid principal sum due on the Note and Mortgage, along with all unpaid interest, advances, fees and costs, shall be accelerated and is now due and payable.

9. The Note and Mortgage do not contain a prepayment penalty.

10. The following defendants are joined herein because they are either the holder of an instrument or interest appearing of record which affect or may affect the Mortgaged Premises, or because they are the holder of a legal and equitable interest in the Mortgaged Premises which is subordinate to plaintiff's Mortgage lien:

a. TD Bank fka TD Bank, NA; American Express Centurion Bank; New Century Financial Services Inc; Unsatisfied Claim and Judgment Fund; are made party defendants to this foreclosure action by reason of the following judgments entered in the Office of the Clerk of the Superior Court of New Jersey, recovered against plaintiff's mortgagor(s) and/or record owners of the property.

SUPERIOR COURT OF NEW JERSEY
JUDGMENT NUMBER: 0-121412-2010 PAGE NUMBER: 1 DECEMBER 06
DATE ENTERED: 09 10 10 DATE SIGNED: 02 08 10
TYPE OF ACTION: OTHER
VENUE: BURLINGTON

DEBTOR: C
A F A 741 979.77
A F A 3 119.80

CREATOR: C
TD BANK, NA
ATTORNEY: DEWEE & CALDWELL
1800 ROUTE 78, SUITE 105
MOUNT LAUREL, NJ 08054
856-154-8884

DEBTOR: C
CHRISTINA REED
No Address
A F A
CHRISTINA ACHLEY REED
No Address
FRANK REED
No Address
A F A
FRANK JOSEPH REED III
No Address
PLUS COSTS

SUPERIOR COURT OF NEW JERSEY
JUDGMENT NUMBER: 0-121412-2010 PAGE NUMBER: 1 DECEMBER 06
DATE ENTERED: 09 08 10 DATE SIGNED: 09 10 10
TYPE OF ACTION: OTHER
VENUE: BURLINGTON

DEBTOR: C 19 694.30
COSTOR: C 240.00

CREATOR: C
AMERICAN EXPRESS CENTURION BANK
ATTORNEY: DWYER & ASSOCIATES

DEBTOR: C
FRANK REED
No Address

SUPERIOR COURT OF NEW JERSEY
JUDGMENT NUMBER: 0-121412-2010 PAGE NUMBER: 1 DECEMBER 11
DATE ENTERED: 08 18 11 DATE SIGNED: 07 08 11
TYPE OF ACTION: BOB ADD
VENUE: BURLINGTON

DEBTOR: C 19 1116.91
COSTOR: C 256.76

CREATOR: C
NEW CENTURY FINANCIAL SERVICES INC
ATTORNEY: PRECOLE & PRECOLE
7 HUNTER RD
PARSONSFARM NJ 07054
973-261-5100

DEBTOR: C
CHRISTINA REED
No Address

*** End of Abstract ***

SUPERIOR COURT OF NEW JERSEY
JUDGMENT NUMBER J-007860-2010 PAGE NUMBER 1 001311 87
DATE ENTERED 10 18 11 DATE SIGNED 06 18 11
TYPE OF ACTION: AUTO NEGL
VENUE: EGGH
DEBT: \$ 15,000.00
CREDITOR: C
UNSATISFIED CLAIM AND JUDGMENT FUND
ATTORNEY: BURKE & POTENZA
100 PARTICIPANT RD STE 100
PARTICIPANT NJ 07054
671-511-8600
DEBTOR: C
FRANK REED
No Address
MARION H. HAINMAN
No Address
PLUS 00000 ORDER REVIEWING JUDGE J-040760-87

*** End of Abstract ***

b. The State of New Jersey is made a party defendant to this foreclosure action by reason of the following judgment entered in the office of the Clerk of the Superior Court of New Jersey recovered against plaintiff's mortgagor(s) and/or current owner(s):

SUPERIOR COURT OF NEW JERSEY
JUDGMENT NUMBER J-040760-1993 PAGE NUMBER 1-0411-87
DATE ENTERED 11 30 93 DATE SIGNED 11 31 93
TYPE OF ACTION: AUTO NEGL
VENUE: EGGH
DEBT: \$ 15,000.00
CREDITOR: C
RICHARD EPPS
ATTORNEY: NICHOLAS STEFANOWICZ JR.
SAMUEL V. FORTUNATO, COMMISSIONER OF INSURANCE, ASSIGNEE
DEBTOR: C
MARION H. HAINMAN
No Address
FRANK REED
No Address
CREDITOR: C
UNSATISFIED CLAIMS AND JUDGMENT FUND
DEBTOR: C
MARION H. HAINMAN
No Address
FRANK REED
No Address
04-18-93 ASSIGNED TO SAMUEL FORTUNATO, COMMISSIONER DEPARTMENT OF
INSURANCE RECORDED 10-09-93
10-18-11 ORDER REVIEWING JUDGE, SEE J-007860-11

*** End of Abstract ***

c. The United States of America is a party defendant to this foreclosure action by reason of the following notices of federal tax liens entered in the Office of the Clerk of Burlington County recovered against plaintiff's mortgagor(s), Frank J. Reed III and Christina A. Reed, husband and wife:

RELEASE
BOOK 170 PAGE 148
DATE 06/16/09
RECORDER: M. PERRY
TIMOTHY D TYLER, COUNTY CLERK

4804 Department of the Treasury - Internal Revenue Service

Form 668 (7)(c)
(Rev. February 2004)

Notice of Federal Tax Lien

Area: SMALL BUSINESS/SELF EMPLOYED AREA #2
Lien Unit Phone: (800) 913-6050

Serial Number: 484046608

For Optional Use by Recording Office
GENERAL COUNTY CLERK

As provided by section 6321, 6322, and 6323 of the Internal Revenue Code, we are giving a notice that taxes (including interest and penalties) have been assessed against the following named taxpayer. We have made a demand for payment of this liability, but it remains unpaid. Therefore, there is a lien in favor of the United States on all property and rights to property belonging to this taxpayer for the amount of these taxes, and additional penalties, interest, and costs that may accrue.

REVOCATION OF RELEASE OF A FEDERAL LIEN
BK# 303 PG37
RECORDED BY: M. PERRY
TIMOTHY D TYLER, COUNTY CLERK

Name of Taxpayer: FRANK J & CHRISTINA A REED III

Residence: 817 MATLACK DR
MOORESTOWN, NJ 08057-1443

IMPORTANT RELEASE INFORMATION: For each assessment listed below, unless notice of the lien is refiled by the date given in column (e), this notice shall, on the day following such date, operate as a certificate of release as defined in IRC 6325(a).

Kind of Tax (a)	Tax Period Ending (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (f)
1040	12/31/2003	XXX-XX-7464	10/29/2007	11/28/2017	10311.86
1040	12/31/2004	XXX-XX-7464	04/07/2008	05/07/2018	14434.50
1040	12/31/2005	XXX-XX-7464	05/19/2008	06/18/2018	51413.35
1040	12/31/2007	XXX-XX-7464	06/02/2008	07/02/2018	11446.28

Place of Filing: Office of the County Clerk
Burlington
MOUNT HOLLY, NJ 08060

Total \$ 87605.99

This notice was prepared and signed at DETROIT, MI

BOOK 170 PAGES 147-148

the 20th day of October, 2008

Signature: R. A. Mitchell
for G. NAIDAS

Title: REVENUE OFFICER
(856) 414-6734
22-08-4114

RECORDING DATA PAGE

Consideration :
Code :
Transfer Fee :
Recording Date: 10/31/2008
Document No : 4594550 bscelza

INTERNAL REVENUE SERVICE
PO BOX 145595
CINCINNATI, OH 45250


Receipt No : 798265
Document No : 4594550
Document Type : FTL
Recording Date: 10/31/2008
Login Id : bscelza

BOOK 170 PAGES 147-148

Filed
Oct 31 2008 01:42pm
Burlington County Clerk

Clerk of Burlington County • 49 Rancocas Rd. • Mt. Holly, NJ 08060
609-265-5180

Form 12474 <small>(Rev. 10-00)</small>		362 Department of the Treasury - Internal Revenue Service Revocation of Certificate of Release of Federal Tax Lien			
Area: SMALL BUSINESS/SELF EMPLOYED AREA #2 Lien Unit Phone (800) 913-6050		Serial Number 484046608		For Use by Recording Office BURLINGTON COUNTY CLERK 2012 FEB 14 P 2:41 RECEIVED	
I certify that we mistakenly issued a certificate of release of the Notice of Federal Tax Lien filed against the taxpayer named below. I declare that the certificate of release filed on <u>03rd</u> <u>June</u> <u>2009</u> is revoked and that the lien is reinstated as provided under Internal Revenue Code Section 6325(f)(2).					
Name of Taxpayer: FRANK J & CHRISTINA A REED III					
Residence: 817 MATLACK DR MOORESTOWN, NJ 08057-1443					
COURT RECORDING INFORMATION:					
Liber 170	Page 147-148	UCC No. n/a	Serial No. n/a		
Kind of Tax (a)	Tax Period Ending (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (f)
1040	12/31/2003	XXX-XX-7464	10/29/2007	11/28/2017	10311.86
1040	12/31/2004	XXX-XX-7464	04/07/2008	05/07/2018	14434.50
1040	12/31/2005	XXX-XX-7464	05/19/2008	06/18/2018	51413.35
1040	12/31/2007	XXX-XX-7464	06/02/2008	07/02/2018	11446.28

BOOK 203 PAGES 37-38 A					
Place of Filing: Office of the County Clerk Burlington MOUNT HOLLY, NJ 08060					Total \$ 87605.99
This notice was prepared and signed at <u>DETROIT, MI</u> on this,					
the <u>07th</u> day of <u>February</u> <u>2012</u>					
Signature: 			Title: Director, Campus Compliance Operations		
<small>(NOTE: Certificate of officer authorized by law to take acknowledgments is not essential to the validity of Revocation of Certificate of Release of Federal Tax Lien Rev. Rul. 71-466 1971-2 C.B. 409)</small>					
Part 1 - RECORDING OFFICE COPY					Form 12474 (Rev. 10-00) CAT NO T3173W

**Reason for Revoking the Certificate of Release of Federal Tax Lien
and Reinstating the Notice of Federal Tax Lien**

- ☒ Federal Tax Lien released in error.
- ☐ Failure to comply with collateral agreement in connection with a compromise.
- ☐ Liability was not discharged through litigation.
- ☐ Notice of Federal Tax Lien was not refiled timely.

RECORDING DATA PAGE

Consideration :
Code :
Transfer Fee :
Recording Date: 02/15/2012
Document No : 4868387 sbunn


INTERNAL REVENUE SERVICE
PO BOX 145595
CINCINNATI, OH 45250

Receipt No : 981598
Document No : 4868387
Document Type : FTLV
Recording Date: 02/15/2012
Login Id : sbunn

BOOK 203 PAGES 37-38 A

Filed
Feb 15 2012 04:43pm
Burlington County Clerk

Clerk of Burlington County • 49 Rancocas Rd. • Mt. Holly, NJ 08060
609-265-5180

RECORDING INFORMATION SHEET		49 RANOCAS RD., MT HOLLY, NJ 08060	
INSTRUMENT NUMBER: 4884602	DOCUMENT TYPE: FEDERAL TAX LIEN		
Official Use Only	Document Charge Type: FEDERAL TAX LIEN		
<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> TIMOTHY D. TYLER BURLINGTON COUNTY </div> <div style="margin-bottom: 5px;"> RECEIPT NUMBER 8025812 RECORDED ON May 08 2012 11:22 AM </div> <div style="margin-bottom: 5px;"> INSTRUMENT NUMBER 4884602 </div> <div> BOOK: OR13008 PAGE: 3146 </div>	Return Address (for recorded documents) USA - INTERNAL REVENUE 44 SOUTH CLINTON AVENUE TRENTON NJ 08609		
	No. Of Pages <i>(Excluding Recording Information and/or Summary Sheets)</i>		1
	Consideration Amount		\$0.00
	Recording Fee		\$25.00
	Realty Transfer Fee		\$0.00
	Total Amount Paid		\$25.00
	Municipality MOORESTOWN TWP		
	Parcel Information		
Block:			
Lot:			
First Party Name FRANK J REED III			
Second Party Name INTERNAL REVENUE SERV			
Additional Information (Official Use Only)			
<div style="margin-bottom: 10px;">  4884602 </div>			
Cert Id: 5074348 Recording Clerk: tamith			
***** DO NOT REMOVE THIS PAGE ***** COVER SHEET (DOCUMENT SUMMARY FORM) IS PART OF BURLINGTON COUNTY FILING RECORD ***** RETAIN THIS PAGE FOR FUTURE REFERENCE *****			

3756		Department of the Treasury - Internal Revenue Service			
Form 668 (Y)(c) (Rev. February 2004)		Notice of Federal Tax Lien			
Area: SMALL BUSINESS/SELF EMPLOYED AREA #2 Lien Unit Phone: (800) 913-6050		Serial Number 864554312	For Optional Use by Recording Office		
<p>As provided by section 6321, 6322, and 6323 of the Internal Revenue Code, we are giving a notice that taxes (including interest and penalties) have been assessed against the following-named taxpayer. We have made a demand for payment of this liability, but it remains unpaid. Therefore, there is a lien in favor of the United States on all property and rights to property belonging to this taxpayer for the amount of these taxes, and additional penalties, interest, and costs that may accrue.</p>					
Name of Taxpayer FRANK J & CHRISTINA A REED III					
Residence 817 MATLACK DR MOORESTOWN, NJ 08057-1443					
<p>IMPORTANT RELEASE INFORMATION: For each assessment listed below, unless notice of the lien is refuted by the date given in column (d), this notice shall, on the day following such date, operate as a certificate of release as defined in IRC 6325(a).</p>					
Kind of Tax (a)	Tax Period Ending (b)	Identifying Number (c)	Date of Assessment (d)	Last Day for Refiling (e)	Unpaid Balance of Assessment (f)
1040	12/31/2003	XXX-XX-7464	10/29/2007	11/28/2017	2331.29
1040	12/31/2004	XXX-XX-7464	04/07/2008	05/07/2018	15650.08
1040	12/31/2005	XXX-XX-7464	05/19/2008	06/16/2018	60093.07
1040	12/31/2007	XXX-XX-7464	06/02/2008	07/02/2018	12979.69
Place of Filing Office of the County Clerk Burlington MOUNT HOLLY, NJ 08060					Total \$ 91054.13

This notice was prepared and signed at DETROIT, MI, on this,

the 30th day of April, 2012.

Signature  for MARK J SPITZ	Title REVENUE OFFICER (856) 414-6710
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(NOTE: Certificate of officer authorized by law to take acknowledgment is not essential to the validity of Notice of Federal Tax Lien.
Rev. Rul. 71-456, 1971-2 C.B. 409)

Part 1 - kept by Recording Office

Form 668(Y)(c) (Rev. 2-2004)
CAT. NO 80025X

Book # OR13008 Page # 3146 Inst. # 4884602

11. Frank J. Reed III is also known as Frank Reed aka Frank Joseph Reed III and is being designated as Frank J. Reed III. He/she is one and the same person.

12. Christina A. Reed is also known as Christina Reed aka Christina Ashley Reed and is being designated as Christina A. Reed. He/she is one and the same person.

13. The following defendants are joined herein because they are the holder of an instrument or interest appearing of record which affect or may affect the Mortgaged Premises which has been paid in full but have not been discharged of record:

NONE

14. In the event plaintiff is unable to determine the present whereabouts of defendant(s) Frank J. Reed III, Christina A. Reed, or ascertain if he/she/they is/are presently alive, and as a precaution, plaintiff has joined the following persons as party defendants to this foreclosure action for any lien, claim or interest they may have in, to, or against the mortgaged premises:

Frank J. Reed III; Christina A. Reed; his/her/their heirs, devisees and personal representatives, and his/her/their or any of their successors in right, title and interest.

15. Pursuant to the terms of the Note and Mortgage, plaintiff (or its predecessors, successors or servicing agent), reserved the right to pay taxes, municipal charges, or other liens affecting the Mortgaged Premises, which charges or liens are superior to the lien of the Mortgage. When paid by plaintiff (or its predecessors, successors, or servicing agent), these taxes, municipal charges, or other liens, together with interest thereon, are to be added to the amount due plaintiff, whether such advances were made prior to the filing of this action or during its pendency.

16. Plaintiff has complied with the Fair Foreclosure Act N.J.S.A. 2A:50-53, et seq., by serving the required Notice of Intention to Foreclose at least 30 days in advance of filing of this complaint.

WHEREFORE, the plaintiff demands judgment:

- (a) Fixing the amount due on the Mortgage;
- (b) Barring and foreclosing the defendants and each of them of all equity of redemption in and to the Mortgaged Premises;
- (c) Directing that plaintiff be paid the amount due as provided in the Mortgage, together with interest, fees, costs and advances;
- (d) Adjudging that the Mortgaged Premises be sold according to law to satisfy the amount due to plaintiff on the Mortgage; and
- (e) Appointing a receiver of the rents, issues and profits of the Mortgaged Premises.

SECOND COUNT

1. Plaintiff hereby repeats, re-alleges, and incorporates the allegations set forth in the First Count of the Complaint, as if set forth herein at length.

2. By the terms of the Note and Mortgage, plaintiff is entitled to possession of the Mortgaged Premises and all appurtenances.

3. The Mortgagor(s) and Obligor(s) named herein has or may claim to have certain rights in the Mortgaged Premises, and by reason thereof, has or have deprived plaintiff of possession of the Mortgaged Premises.

WHEREFORE, plaintiff demands judgment against the defendants, except those protected by N.J.S.A. 2A:18-61.1, et. seq.:

- (a) for possession of the Mortgaged Premises in favor of plaintiff or its assignee or designee, which right to possession shall be transferred to the successful purchaser at the foreclosure sale;
- (b) for costs.

ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Plaintiff

By: Monika S. Pundalik
MONIKA S. PUNDALIK, ESQ.
FOR THE FIRM

Dated: February 26, 2014

NOTICE REQUIRED BY THE
FAIR DEBT COLLECTION PRACTICES ACT, (the act),
15 U.S.C. SECTION 1601 AS AMENDED

**THIS IS AN ATTEMPT TO COLLECT A DEBT.
ANY INFORMATION OBTAINED
WILL BE USED FOR THAT PURPOSE.**

1. The amount due on the debt, as of February 14, 2014, is the sum of \$1,565,606.25. This sum does not include foreclosure fees and costs or any payments received or advances made after that date.

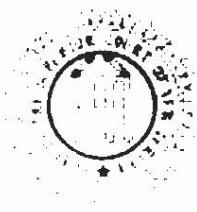

2. The debt described in the complaint attached hereto and evidenced by the copy of the mortgage and note, will be assumed to be valid by the creditor's law firm, unless debtors, within thirty (30) days after receipt of this Notice, disputes, in writing, the validity of the debt or some portion thereof.

3. If the debtor notifies the creditor's law firm in writing within thirty (30) days of the receipt of this Notice, that the debt or any portion thereof, is disputed, the creditor's law firm will obtain verification of the debt and a copy of the verification will be mailed to the debtor by the creditor's law firm.

4. If the creditor who is named as plaintiff in the attached summons and complaint, is not the original creditor, and if the debtor makes written request to the creditor's law firm within thirty (30) days from the receipt of this Notice, the name and address of the original creditor will be mailed to the debtor by the creditor's law firm.

5. Written request should be addressed to ZUCKER, GOLDBERG & ACKERMAN, LLC, 200 Sheffield Street, Suite 101, P.O. Box 1024, Mountainside, New Jersey 07092-0024. Please refer to our file number, which is **XCZ-102962-R1**.

***THIS IS AN ATTEMPT TO COLLECT A DEBT.
ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.***

FORECLOSURE CASE INFORMATION STATEMENT (FCIS)		FOR USE BY CLERK'S OFFICE ONLY
 <p>Use for Initial Chancery Division - General Equity foreclosure pleadings (not motions) under Rule 4:5-1. Pleading will be rejected for filing, under Rule 1:5-6 (c), if information is not furnished or if attorney's signature is not affixed.</p>		PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA <input type="checkbox"/> MO RECEIPT NO.: AMOUNT: OVERPAYMENT: BATCH NUMBER: BATCH DATE:
SECTION A: TO BE COMPLETED BY ALL PARTIES		
CAPTION 21st Mortgage Corporation vs. Frank J. Reed III, et al.	COUNTY OF VENUE Burlington DOCKET NUMBER (When available)	
NAME OF FILING PARTY (e.g., John Doe, Plaintiff) 21st Mortgage Corporation, Plaintiff	DOCUMENT TYPE <input checked="" type="checkbox"/> COMPLAINT <input type="checkbox"/> ANSWER <input type="checkbox"/> OTHER	
ATTORNEY NAME (if applicable) Monika S. Pundalik, Esq. XCZ- 102962-R1	FIRM NAME (if applicable) Zucker, Goldberg & Ackerman, LLC	
MAILING ADDRESS 200 Sheffield Street, Suite 101 Mountainside, NJ 07092	TELEPHONE NUMBER (908) 233-8500	
SECTION B: TO BE COMPLETED BY PLAINTIFF TO INITIAL COMPLAINT		
FORECLOSURE CASE TYPE NUMBER <input type="checkbox"/> 088 IN PERSONAM TAX FORECLOSURE <input type="checkbox"/> 089 IN REM TAX FORECLOSURE <input checked="" type="checkbox"/> 0RF RESIDENTIAL MORTGAGE FORECLOSURE <input type="checkbox"/> 0CF COMMERCIAL MORTGAGE FORECLOSURE <input type="checkbox"/> 0CD CONDOMINIUM OR HOMEOWNER'S ASSOCIATION LIEN FORECLOSURE <input type="checkbox"/> 091 STRICT FORECLOSURE <input type="checkbox"/> 0FP OPTIONAL FORECLOSURE PROCEDURE (NO SALE)	IS THIS A HIGH RISK MORTGAGE PURSUANT TO P.L. 2009 c.84 AND P.L. 2008, c.127 <div style="text-align: center;">[] YES [X] NO</div> PURCHASE MONEY MORTGAGE? [X] YES [] NO RELATED PENDING CASE? [] YES [X] NO IF YES, LIST DOCKET NUMBERS:	
FULL PHYSICAL STREET ADDRESS OF PROPERTY: 817 Matlack Drive, Moorestown, NJ ZIP CODE: 08057 COUNTY: Burlington	MUNICIPALITY CODE (*) 0322 MUNICIPAL BLOCK: 3803 (LOTS): 2	
ALL FILING PARTIES MUST SIGN AND PRINT NAME(S) AND DATE THE FORM BELOW		
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).		
ATTORNEY/SELF REPRESENTED SIGNATURE 	PRINT ATTORNEY/SELF REPRESENTED NAME Monika S. Pundalik, Esq.	DATE February 26, 2014

MONIKA S. PUNDALIK
MP 006542003

XCZ-102962-R1/bga
ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Plaintiff
200 Sheffield Street, Suite 101
Mountainside, NJ 07092-0024
1-908-233-8500

21st Mortgage Corporation

Plaintiff,

vs.

Frank J. Reed III, his/her heirs, devisees, and personal
representatives, and his, her, their or any of their
successors in right, title and interest; et al.

Defendant(s)

: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION
: BURLINGTON COUNTY
: DOCKET NO.

Civil Action

RULE 4:5-1 CERTIFICATION

Monika S. Pundalik, Esq., hereby certifies that:

1. I am an attorney licensed to practice in the state of New Jersey and an attorney with the law firm of Zucker, Goldberg & Ackerman, L.L.C. I make this certification pursuant to the Rules of Court and in support of the complaint filed in this matter.
2. To the best of my knowledge and belief, the matter in controversy is not the subject of any other action or arbitration proceeding pending or contemplated.
3. To the best of my knowledge and belief there are no other non-parties that need to be joined at this time.
4. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Plaintiff

By: Monika S. Pundalik
MONIKA S. PUNDALIK, ESQ.
FOR THE FIRM

Dated: February 26, 2014

MICHAEL S. ACKERMAN
MSA 011191976

XCZ-102962-R1/alel
ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Plaintiff
200 Sheffield Street, Suite 101
Mountainside, NJ 07092-0024
1-908-233-8500

21st Mortgage Corporation	:	SUPERIOR COURT OF NEW JERSEY
	:	CHANCERY DIVISION
	:	BURLINGTON COUNTY
Plaintiff,	:	GENERAL EQUITY
vs.	:	
	:	DOCKET NO.
Frank J. Reed III; et al	:	
	:	<u>Civil Action</u>
Defendant.	:	
	:	CERTIFICATION OF DILIGENT
	:	INQUIRY TO BE ANNEXED TO
	:	RESIDENTIAL MORTGAGE
	:	FORECLOSURE COMPLAINT
	:	PURSUANT TO RULE 1:5-6(c)(1)(E) AND
	:	RULES 4:6-1(a)(2) AND (a)(3)

Michael S. Ackerman, Esq. of full age, hereby certifies and says:

1. On March 3, 2014, I communicated electronically with the following named employee(s) of 21st Mortgage Corporation, who stated that he/she personally reviewed the complaint to be filed with the court and that he/she confirmed compliance with *Rule* 4:64-1(b)(1) through (b)(10) and (b)(12) through (b)(13).

2. The name, title and responsibilities of the plaintiff's employee(s) with whom I communicated are:

Name of plaintiff's employee:

Ryan Shelly

Title of plaintiff's employee:

Legal Coordinator

Responsibilities of plaintiff's employee:

Foreclosure Review

3. Based on my communication with the above-named employee(s) of plaintiff, as well as my own inspection of the loan information supplied by plaintiff and other diligent inquiry, I executed this certification to comply with the requirements of Rules 1:4-8(a), 1:5-6(c)(1)(E), and 4:64-1(a)(2) and (a)(3).

4. I am aware that I have a continuing obligation under Rule 1:4-8 to amend this certification if a reasonable opportunity for further investigation or discovery indicates insufficient evidentiary support for any factual assertions proffered by plaintiff in any court filings or documents in this case.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: March 3, 2014

ZUCKER, GOLDBERG & ACKERMAN, LLC

By: _____



MICHAEL S. ACKERMAN, ESQ.

MONIKA S. PUNDALIK
MP 006542003

XCZ-102962-R1/bga
ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Plaintiff
200 Sheffield Street, Suite 101
Mountainside, NJ 07092-0024
1-908-233-8500

21st Mortgage Corporation

Plaintiff,

vs.

Frank J. Reed III, his/her heirs, devisees, and personal
representatives, and his, her, their or any of their
successors in right, title and interest; et al.

Defendant(s)

: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION
: BURLINGTON COUNTY
: DOCKET NO.

Civil Action

RULE 4:64-1 CERTIFICATION

Monika S. Pundalik, Esq., hereby certifies that:

1. I am an attorney licensed to practice in the state of New Jersey and an attorney with the law firm of Zucker, Goldberg & Ackerman, L.L.C. I make this certification pursuant to the Rules of Court and in support of the complaint filed in this matter.
2. Prior to the filing of this Complaint, a title search of the public record was received and reviewed.
3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Plaintiff

By: Monika S. Pundalik
MONIKA S. PUNDALIK, ESQ.
FOR THE FIRM

Dated: February 26, 2014

MONIKA S. PUNDALIK
MP 006542003

XCZ-102962-R1/bga
ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Plaintiff
200 Sheffield Street, Suite 101
Mountainside, NJ 07092-0024
1-908-233-8500

21st Mortgage Corporation

Plaintiff,

vs.

Frank J. Reed III, his/her heirs, devisees, and personal
representatives, and his, her, their or any of their
successors in right, title and interest; et al.

Defendant(s)

: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION
: BURLINGTON COUNTY
: DOCKET NO.

Civil Action

RULE 1:38-7(c) CERTIFICATION

Monika S. Pundalik, Esq., hereby certifies that:

1. I am an attorney licensed to practice in the state of New Jersey and an attorney with the law firm of Zucker, Goldberg & Ackerman, L.L.C. I make this certification pursuant to the Rules of Court and in support of the complaint filed in this matter.

2. I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from documents submitted in the future in accordance with Rule 1:38-7(c).

3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Plaintiff

By:



MONIKA S. PUNDALIK, ESQ.
FOR THE FIRM

Dated: February 26, 2014